REMARKS

Claims 1-36 are currently pending in the patent application. The Examiner has rejected Claims 1-36 under 35 USC 103 as unpatentable over Rowney in view of Patel. For the reasons set forth below, Applicants respectfully assert that all of the pending claims, as amended, are patentable over the cited prior art.

The present invention is directed to an enterprise-based system for processing transactions wherein a transaction management system automatically creates an electronic transaction comprising an electronic representation of the transaction and a plurality of verifiable anonymous role certificates which must be completed, comprising at least one verifiable anonymous role certificate to be completed for each of the plurality of roles for which approval is required to obtain authorization of the transaction. The electronic transaction is then routed to obtain the relevant approvals which comprise completed role certificates, followed by verifying the

CH919990042   -18-

authenticity of the completed role certificates against stored role certificates with corresponding signatures.

The claims expressly recite that "role certificates" are included in the electronic authorization of the transaction, since approvals have to be obtained for each of a plurality of roles but nor for each of a plurality of individuals. The term "role certificate" is a specific term which was defined in the Specification from the bottom of page 8 to the bottom of page 10, and is a certificate which represents the role, and not the person, from which approval must be obtained for authorization of the transaction. Applicants respectfully assert that the Examiner cannot ignore the express definition of the term which has been supplied by Applicants and should not erroneously interpret the term to mean something other than the expressly-provided definition. To suggest that the expressly-defined term "role certificate" is the same as a user-specific authorization, as further discussed below with reference to the Rowney and Patel references, is simply not tenable.

Applicants further note that the role certificates are anonymous (see: page 9, lines 1-page 10, line 1), so that authorization is associated with a role and not a person, and are generated in a format requiring completion. What is

CH919990042   -19-

generated in the present invention is an electronic authorization "form" of a transaction including the electronic representation of the transaction and the plurality of anonymous role certificates *to be completed.* The present claims do not recite a system and method for generating a completed authorization by an authorizing body. Rather, they recite a system and method for generating and distributing an electronic authorization which must be completed, and then verified.

Applicants have amended that language of many of the independent claims to highlight the fact that the role certificates which are part of the electronic representation of the transaction are anonymous, that the role certificates require completion, and that a plurality of the anonymous role certificates are associated with a transaction, at least one for each needed approval. Neither of the cited prior art references teaches or suggests the creation or processing of an electronic transaction having a plurality of verifiable anonymous role certificates.

CH919990042   -20-

The Rowney patent teaches a three-step approval system wherein a first computer (the customer computer) submits a name and value pair to an administrative function located on a third computer (the merchant computer); the third computer sends the name and value pair along with identifying certification information to a certification authority on a second computer (a payment gateway); and, the second computer creates a certificate comprising the name and value pair and other certification information. The created certificate is used for authenticating the identity of the customer using the first computer as a party that can pay the stated value. The certificate is a completed authentication which is user-specific. The Rowney user-specific certificate is not anonymous. The entity which is generating the user-specific certificate is the authenticating entity.

Applicants respectfully assert that the Rowney patent provides no teachings of verifiable anonymous role certificates which require completion being included in any of the communications which are passed among the three computers, as acknowledged by the Examiner. The Rowney communications may include "certification information" and may result in a "certificate" being rendered by the payment

CH919990042   -21-

gateway for identifying the customer, but there are no teachings or suggestions of an automatically generated electronic transaction comprising an electronic representation of the transaction and at least one verifiable role certificate to be completed for each role for which approval is required to obtain authorization of the transaction. Applicants respectfully assert that Rowney does not teach or suggest creating an electronic authorization of a transaction including an electronic representation of the transaction; does not teach or suggest role certificates, but teaches user-specific authorizations; does not teach or suggest anonymous certificates, but includes name-value pairs which are user-specific; and, does not teach or suggest that certificates are generated *for authentication completion*, but are complete user-specific certificates generated by the authenticating entity.

The Examiner has acknowledged that the Rowley patent does not teach creating or processing an electronic representation of a transaction and further that Rowley does not teach or suggest the use of verifiable role certificate for each role for which approval is required to authorize a transaction. The Examiner has cited the Patel patent

CH919990042   -22-

publication as providing those teachings which are missing from the Rowley patent.

The Patel patent publication teaches a system and method for providing secure anonymous communication between a first and second party wherein a third party creates an anonymous certificate for the first party to use in communications with the second party. The anonymous certificate is a user-specific certificate generated by a certifying or authenticating entity (i.e., the third party). Each created user-specific certificate has a selected attribute which is used by the second party for verification purposes. When the second party receives the completed certificate with the selected attribute, the second party agrees to establish the requested communication with the anonymous first party. While the certificate is anonymous, the certificate is user-specific and is a completed certificate which is generated by the authenticating or certifying entity. Patel does not teach creating an electronic authorization of a transaction including an electronic representation of the transaction; does not teach or suggest role certificates, but teaches user-specific authorizations; and, does not teach or suggest that certificates are generated *for authentication completion,*

CH919990042   -23-

but are complete user-specific certificates generated by the authenticating entity.

Applicants disagree with the Examiner's interpretation of the Patel teachings found in the Abstract and at paragraph 0011. The Examiner concludes that Patel teaches an electronic representation of the transaction. However, what Patel teaches in those passages is the creating an anonymous certificate asserting a selected attribute of the first party. The certificate is not an electronic representation of the transaction, it is simply an anonymous certificate which identifies the first party. The certificate does not include any transaction-specific information. Moreover, the selected attribute is an attribute of the first party for whom the certificate is being created. For example, as taught by Patel in paragraph 0033, the attribute may be age, citizenship, financial status, etc. which would further identify that first party. The attribute may identify the first party user as someone who able to view certain age-restricted content. The attribute is not, however, an electronic representation of a transaction.

Further, the Examiner has stated that Patel teaches at least one verifiable anonymous role certificate for each

CH919990042   -24-

role for which approval is required to obtain authorization of the transaction. However, Patel makes no mention of role certificates or roles for which approval is required. Patel's certifying entity simply generates a completed, user-specific though anonymous, identifying certificate. Patel does not create an electronic authorization of a transaction including an electronic representation of the transaction; does not teach or suggest role certificates, but teaches user-specific certification; and, does not teach or suggest that certificates are generated *for authentication completion*, but teaches complete user-specific certificates generated by the certifying entity.

Applicants respectfully assert that the combination of Rowley and Patel would not obviate the invention as claimed. Since neither Rowley nor Patel teaches or suggests the creation and use of an electronic transaction having a plurality of verifiable anonymous role certificates to be completed, at least one role certificate to be completed for each role for which approval must be obtained, it cannot be maintained that the combination renders the claim language obvious. Applicants contend that the Examiner has not made

CH919990042   −25−

out a *prima facie* case of obviousness since the references do not teach or suggest each and every claim feature.

Applicants further aver that, even if one were to modify the Rowley patent system with the teachings of Patel, one would not arrive at the invention as claimed. The combination would result in a modified system wherein the customer computer would submit a name and value pair to an administrative function located at an authenticating entity, after which the authenticating entity would generate a completed, user-specific but anonymous, certificate for the user to utilize in communications with yet another entity. The resulting combination would not, however, teach or suggest steps or means for automatically assembling an electronic authorization of a transaction comprising an electronic representation of the transaction and a plurality of verifiable anonymous role certificates to be completed comprising at least one verifiable anonymous role certificate to be completed for each of a plurality of roles for which approval is required to obtain authorization of the transaction; distributing the electronic authorization for completion of said plurality of role certificates; extracting completed verifiable role certificates from the electronic authorization; and verifying whether completed

CH919990042   -26-

role certificates, associated with the authorization, are themselves authentic, as claimed.

Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration of the amended claim language in light of the remarks, withdrawal of the rejections based on Rowney and Patel, and allowance of the claims.

Respectfully submitted,

H. Ludwig, et al

By: _Anne Vachon Dougherty_
Anne Vachon Dougherty
Registration No. 30,374
Tel. (914) 962-5910

CH919990042   -27-